

**Letter to Special Procedures Where Payments and/or  
Collateral Agreement are to be Monitored by  
Special Procedures**

Re: \_\_\_\_\_

Dear \_\_\_\_\_:

There are enclosed one copy each of our letters of this date advising the [proponent] [United States Attorney] and [District] [Chief] Counsel, Internal Revenue Service, of the acceptance of the offer in the above-entitled case. There (is) (are) also enclosed one copy (each) of the offer dated \_\_\_\_\_ [and amendment(s) dated \_\_\_\_\_].

Under the terms of the settlement, (name of taxpayer and SSN or EIN \_\_\_\_\_ is to pay (set forth payment terms) \_\_\_\_\_

\_\_\_\_\_.  
[The settlement is (to be) secured by a judgment in the amount of \$ \_\_\_\_\_, plus interest from the date(s) of assessment to payment, (which was entered by the court on \_\_\_\_\_) (which will be entered shortly). (A copy of the judgment is enclosed.) (We will forward you a copy of the judgment after it has been entered.)]

[Pursuant to the settlement, (name of taxpayer) \_\_\_\_\_ [has executed] [will execute] a future income collateral agreement [, two copies of which are enclosed]. [We will forward you copies of the collateral agreement after it has been executed by (name of taxpayer) \_\_\_\_\_].]

Payments received pursuant to the settlement [including the collateral agreement] are to be credited against (liability) \_\_\_\_\_.

(Name of taxpayer) \_\_\_\_\_ has been directed to send [all installment payments after the first installment payment] [and] [payments due under the collateral agreement] directly to Special Procedures, which will be responsible for monitoring [these payments] [and] [the collateral agreement]. [(This office) (The United States Attorney) will be responsible for the (lump sum) (initial) (and) (installment) payment(s)]

called for under the settlement, and will direct deposit the payment(s) for transfer to the Internal Revenue Service account.]

[We are closing our file on this case at this time and referring the case to your office for monitoring of [payments] [, including] [payments due under the collateral agreements].] Please immediately advise this office in the event of any default or if the taxpayer requests any modification of the settlement.

Please advise (this office) (the United States Attorney) when all amounts due under the settlement [including (accrued interest) (and) (all amounts due under the collateral agreement)] have been paid.

If you have any questions concerning this matter, please contact (name of litigating section attorney and telephone number)\_\_\_\_\_.

Sincerely yours,

[NAME OF ASSISTANT ATTORNEY GENERAL]  
Assistant Attorney General  
Tax Division

By:

[NAME OF CHIEF OF SECTION]  
Chief, \_\_\_\_\_ Section

Enclosures

cc: [District] [Chief] Counsel  
United States Attorney